- identified or eliminated. And it's a non-conclusion.
- 2 BY MS. LANCASTER:
- Q I realized I forgot to have you identify your
- 4 resume of qualifications. Do you see the copy that I have
- 5 placed in front of you?
- 6 A Yes.
- 7 Q Is this your resume of qualifications?
- 8 A Yes.
- 9 Q Does it accurately summarize your experience?
- 10 A Yes.
- 11 Q I notice on here that you are an instructor of
- 12 questioned document examination?
- 13 A Yes. We teach the basic inspector training
- 14 classes.
- 15 Q And how long have you been doing that?
- 16 A Oh, probably 10, 15 years. I don't really recall
- 17 how long we've been doing it.
- 18 MS. LANCASTER: I'd like to ask just a couple more
- 19 questions, Your Honor.
- BY MS. LANCASTER:
- 21 Q I believe you stated on the minimum qualifications
- for membership into the ABFDE that you had to have a
- two-year full-time residency type apprenticeship before you
- 24 would be minimally qualified. Did you remember stating
- 25 that?

- 1 A Yes. And then a couple of years of experience
- 2 after that.
- Okay. So you have to have -- in addition to that,
- 4 you have to have at least two years of experience?
- 5 A Yes.
- 6 Q Is that full-time experience or part-time?
- 7 A Yes. Full-time.
- 8 Q Before someone would be minimally qualified to
- 9 join ABFDE, can you estimate how many documents they would
- 10 have had to have examined?
- 11 A Hundreds. Hundreds of documents. Throughout
- their training? Yes. And their apprenticeship.
- 13 Q And before someone would be qualified to testify
- in a court case regarding that, would there be further --
- would they have to have examined even more documents?
- MR. ROMNEY: Objection, Your Honor. Calls for
- 17 speculation on the part of the witness. Lacks foundation
- and it's calling for a legal conclusion by Your Honor as to
- 19 what would be required for a witness to be able to be
- 20 certified to testify before a court. That's up to the
- 21 court.
- JUDGE STEINBERG: Sustained.
- MS. LANCASTER: Your Honor, she's an expert in
- 24 this field. I will change it to ask in the industry, if
- that would make it a little more palatable for Mr. Romney,

- 1 but I believe she's certainly qualified to testify about the
- 2 minimally acceptable training for a document analyst to be
- 3 able to testify in a court case.
- 4 JUDGE STEINBERG: Ms. Bolsover has been qualified
- 5 as an expert witness and I think what you are doing is you
- 6 might be anticipating something you might want to use later
- 7 today.
- 8 MS. LANCASTER: So you would prefer I move on?
- 9 Is that what --
- 10 JUDGE STEINBERG: Yes.
- MS. LANCASTER: Okay.
- JUDGE STEINBERG: That's the polite way of
- 13 suggesting that.
- MS. LANCASTER: Okay.
- 15 BY MS. LANCASTER:
- 16 Q Ms. Bolsover, I believe you just stated that you
- 17 received documents from me in late January, early to mid
- 18 February?
- 19 A That's correct.
- 20 You reviewed those documents?
- 21 A Yes, I did.
- 22 Q Did you reach any conclusions regarding the
- 23 documents?
- 24 A Yes, I did.
- Q Will you state your conclusions to the Court?

- 1 A Reading from my report, I have identified Ronald
- 2 Brasher as writing the signature and date that appear on
- 3 Exhibit Q-3, as well as the date in the date box on Exhibit
- 4 0-4.
- I also said that it was highly probable that
- 6 Ronald Brasher wrote the signature and the date appearing on
- 7 Exhibit Q-2 and the signature appearing on Exhibit Q-8.
- 8 Q Were you able to reach any other conclusions
- 9 regarding the document?
- 10 A I found that the signature and date appearing on
- 11 Exhibit Q-5, 6 and 7 all appear to have been written by one
- 12 writer.
- 13 Q Were you able to identify that writer?
- 14 A No, I was not.
- 15 Q Anything else about these documents that you feel
- is pertinent that the Court would like to know?
- 17 A No. That's all that I wrote in my report.
- 18 MS. LANCASTER: Okay. I pass the witness,
- 19 Your Honor.
- JUDGE STEINBERG: Did you want to identify and
- 21 move into evidence any of these things?
- MS. LANCASTER: Yes, sir. I do want to.
- I would like to move into evidence --
- JUDGE STEINBERG: Well, how about -- do you want
- 25 the resume to be part of the record?

- 1 MS. LANCASTER: Yes, sir.
- JUDGE STEINBERG: Okay. We have a two-page
- document entitled Gail Bolsover, Resume of Oualifications.
- 4 It will be marked for identification as EB Exhibit 74.
- 5 (The document referred to was
- 6 marked for identification as
- 7 EB Exhibit No. 74.)
- 8 JUDGE STEINBERG: Any objection to its receipt?
- 9 MR. ROMNEY: No, sir, Your Honor.
- MR. PEDIGO: No, Your Honor.
- 11 JUDGE STEINBERG: Exhibit 74 is received.
- 12 (The document referred to,
- 13 previously identified as EB
- 14 Exhibit No. 74, was received
- in evidence.)
- 16 JUDGE STEINBERG: Then did you want -- there's a
- 17 February 21, 2001 letter. Did you want that to be part of
- 18 the record from Ms. Lancaster? Or is that just handed out
- 19 for information?
- 20 MS. LANCASTER: That was just handed out --
- 21 THE WITNESS: That's my report.
- MS. LANCASTER: That's the report, Your Honor.
- JUDGE STEINBERG: Oh, that's the report. The
- 24 February -- it's this year. I'm asleep. I shouldn't say
- 25 that. I'm not asleep, I'm just confused a bit.

1	Okay. So that's the report. And so you don't
2	want to introduce into evidence
3	MS. LANCASTER: The report and you had requested,
4	Your Honor, that I prepare the other chart and so I believe
5	it probably needs to also go into
6	JUDGE STEINBERG: Okay. Now I'm unconfused.
7	Thank you.
8	We'll identify as EB-75 the two-page report of
9	Ms. Bolsover. That is marked for identification as EB
10	Exhibit 75.
11	(The document referred to was
12	marked for identification as
13	EB Exhibit No. 75.)
14	JUDGE STEINBERG: Any objection to its receipt?
15	MR. ROMNEY: No, sir.
16	MR. PEDIGO: No, Your Honor.
17	JUDGE STEINBERG: Okay. EB Exhibit 75 is
18	received.
19	(The document referred to,
20	previously identified as EB
21	Exhibit No. 75, was received
22	in evidence.)
23	JUDGE STEINBERG: And EB Exhibit 77 is a one-page
24	index. In Ms. Bolsover's report, she uses
25	MR. ROMNEY: This is 76?

1	MR. WILSON: 76.
2	JUDGE STEINBERG: This is not one of my good
3	mornings, is it?
4	Okay. EB 76 is one page, it is an index that
5	correlates the letters that Ms. Bolsover uses in her report,
6	the identifications Q-1 through Q-8, it coordinates those
7	numbers with the exhibits that we have in the record so far
8	and that will be identified as EB Exhibit No. 76.
9	(The document referred to was
10	marked for identification as
11	EB Exhibit No. 76.)
12	JUDGE STEINBERG: Any objection to the receipt of
13	that?
14	MR. ROMNEY: No, sir, Your Honor.
15	JUDGE STEINBERG: Okay. EB-76 is received.
16	And if there are any errors in EB-76 EB-76 is
17	received subject to check because we didn't take the time to
18	go over all of that this morning and if there are errors, if
19	there is an error or errors in the coordination, then
20	somebody will let me know and we will correct them.
21	Mr. Romney?
22	MR. ROMNEY: Thank you, Your Honor.
23	CROSS-EXAMINATION
24	BY MR. ROMNEY:
25	Q Ms. Bolsover, my name is Mark Romney. I represent
	Heritage Reporting Corporation (202) 628-4888

- 1 Ronald Brasher, Patricia Brasher and DLB Enterprises in this
- 2 particular FCC inquiry.
- When is the first time you were certified to
- 4 appear as an expert witness in court, mx?
- 5 A '78 or '79. I can't recall exactly.
- 6 Q Do you remember where that was?
- 7 A In Alexandria.
- 8 O And was that a federal court or state court? What
- 9 was it?
- 10 A Federal court, Judge Orin Lewis.
- 11 Q At the time you appeared for the first time as an
- 12 expert witness in court, were you already recognized by this
- 13 American -- I'll just use ABFDE. Is that correct?
- 14 A That's correct.
- 15 Q You were already certified by them?
- 16 A No, I don't believe that they -- no, I do not
- 17 believe that I met the qualifications at that point.
- 18 Q And so it's not your testimony to the judge today
- that one must be certified by ABFDE in order to be qualified
- 20 to testify before a court, is it?
- 21 A That's for the court to decide, that's not for me
- 22 to decide.
- 23 Q That's right, isn't it? I mean, usually judges
- 24 decide, in your experience, who is qualified to testify and
- 25 who is not?

- 1 A That's correct.
- 2 Q And at the time that you testified for the first
- 3 time in court, you had been working as a forensic document
- 4 analyst for only about a year? Is that correct?
- 5 A Right. I had had two years of training and
- 6 another year with the Postal Service and then I had my first
- 7 case.
- 8 Q Had you given any expert opinions in other cases
- 9 prior to the time you actually appeared in court for the
- 10 first time?
- 11 A Yes, I had signed reports in conjunction with a
- 12 qualified examiner up until that point.
- 13 Q And when was the first time you signed a report?
- 14 Do you remember the year?
- 15 A By myself?
- 16 Q Yes, ma'am.
- 17 A Probably -- as I said, I testified in '78, so it
- was probably about that time. I believe I had been with the
- 19 Postal Service about a year, so that would have been '78,
- 20 '79.
- 21 Q And you're familiar with the fact that in
- litigation matters oftentimes you'll give a report, but not
- 23 be called upon to testify actually in a trial?
- 24 A Oh, yes. I write many reports every day and I've
- 25 testified 75 times in these years.

- 1 Q I'm sure you've written more than 75 reports?
- A Many more than 75 reports. About 75 a year.
- 3 Q And you've given many more depositions than 75?
- 4 A Actually, I've never given a deposition.
- 5 Q They don't call you for depositions?
- A No. They only call us to testify or not.
- 7 Q Okay. Now, there are other organizations out
- 8 there in the world regarding document examination other than
- 9 the ABFDE, I take it?
- 10 A I guess.
- 11 Q You're just not familiar with any of them?
- 12 A I know of the names of some, but I am not familiar
- 13 with their workings.
- 14 Q Are you familiar with an organization called The
- World Association of Document Examiners?
- 16 A Yes, I have heard of them.
- 17 Q And what is that organization? Do you know?
- 18 A It is my understanding that it's some kind of a
- 19 group of graphologists.
- 20 Q And what's a graphologist, in your term?
- 21 A In my understanding, it's they look at the
- 22 handwriting features to determine personality traits as
- 23 opposed to comparing for determining authenticity.
- Q Now, in your mind, there is a difference between
- doing questioned document examination and graphology?

- 1 A Yes.
- 2 Q And a person could be skilled in both of those?
- 3 Is that correct?
- 4 A Sure.
- 5 Q And just because somebody might be considered a
- 6 skilled graphologist does not mean that that person would
- 7 not be able to be considered a skilled and competent
- 8 questioned document examiner?
- 9 A If they've had training in questioned document
- 10 examination, they could be skilled.
- 11 Q And do you have knowledge of the qualifications
- required of membership in The World Association of Document
- 13 Examiners?
- 14 A No, I don't.
- 15 Q Do you have any knowledge of a group called
- 16 American College of Forensic Examiners?
- 17 A Only that they are associated in some way with The
- 18 World Association of Document Examiners. I don't know.
- 19 Q Do you have personal knowledge of the
- 20 qualifications of membership or even if there are
- 21 qualifications for membership in the American College of
- 22 Forensic Examiners?
- A No, I don't.
- Q So you would not be able to testify with any
- 25 personal knowledge today regarding the competency of

- 1 somebody who may have association or membership in those
- 2 particular organizations?
- 3 A No.
- 4 Q Now, this training that you completed for the
- 5 Treasury Department, it says here on your resume you did it
- from 10/75 to 10/78. Is that correct?
- 7 A Well, with Treasury until November '77, at which
- 8 time I went over to the Postal Service and did another year.
- 9 Q And that was full-time training?
- 10 A Yes.
- 11 Q And what did you do, document examination all day
- 12 long, every day?
- 13 A Well, yes. Basically. At the Postal Service,
- 14 because the Postal Service has different kinds of problems
- 15 than the Treasury Department did, I needed to learn about
- 16 stamps and I needed to learn about money orders and I needed
- 17 to learn postal problems and that's what I was working on.
- 18 Q So is it fair to say that a good segment of that
- 19 training involved matters specifically dealing with postal
- 20 matters, as opposed to just pure document examination?
- 21 A No, it was the examination of postal documents,
- being able to identify a real postal stamp as opposed to a
- counterfeit one or looking at postal money orders and being
- 24 able to determine whether they've been altered, whether
- 25 they're genuine.

- 1 Q And that particular type of training, ma'am, that
- 2 is separate and apart from examining questioned signatures,
- 3 for example. Is that correct?
- 4 A Yes, it is, but it's part of a forensic document
- 5 examiner's work.
- 6 Q Yes. And particularly for someone employed by the
- 7 Postal Service, such as yourself?
- 8 A Yes.
- 9 Q So a good portion of that training time that you
- 10 spent in your basic education in this field was spent
- training specifically with matters of postal marks and the
- identifications that might be germane to that type of an
- 13 examination. Is that correct?
- 14 A Once I went to the Postal Service. I had two
- 15 years of training before that.
- 16 O Now, I take it that you have been in court before
- and known of experts that were asked to testify for the
- 18 parties that might be opposing that for whom you
- 19 represented. Is that correct?
- 20 A Yes.
- 21 Q And did you consider the fact that just because
- 22 somebody came to a different conclusion that they
- 23 necessarily lacked the qualifications to testify before the
- 24 court?
- A No. It isn't my position to determine whether

- 1 they're qualified to testify before the court. That's the
- 2 court's decision.
- Well, let's clarify. I mean, document examination
- 4 is not done with any degree of scientific probability, is
- 5 it?
- 6 A Well, I think it is.
- 7 Q Well, explain that to the Court. I mean, is it
- 8 your position that when you state that somebody has been
- 9 identified that you have eliminated all scientific
- 10 possibility that there could be another conclusion?
- 11 A Yes. I'm saying that that person wrote that to
- 12 100 percent certainty.
- 13 Q But you don't attach any sort of a scientific
- 14 prospect to that, do you?
- 15 A I have compared every feature between the
- 16 questioned and known writing and it is my opinion that, yes,
- 17 that is the person who wrote that.
- 18 Q Have you ever been proven to be wrong?
- 19 A Not on identification, no.
- 20 Q Pardon?
- 21 A Not on identification, no.
- 22 Q No finder of fact has ever found against one of
- your identifications? To your knowledge, in all these years
- 24 that you have testified?
- 25 A I'm not sure that I understand the question.

- 1 Q Well, you understand the purpose of an expert
- witness is to give information to guide the finder of fact
- in a trial or a lawsuit. Is that correct?
- 4 A Yes.
- 5 Q And you're not telling the court that every time
- 6 that you have testified on behalf of somebody that the
- 7 finder of fact has always found that your testimony was
- 8 acceptable to them and that they believed it and they
- 9 therefore rendered a verdict based upon your testimony, are
- 10 you?
- 11 A I really have no idea. There have been cases in
- which the person or persons have been found not quilty, but
- I have no idea whether the jury believed my testimony but
- 14 found that there was something else about it that, you
- 15 know -- I don't know what the jury was thinking.
- 16 Q Is it your opinion that two people of the same
- 17 qualifications could look at the same matter and come to
- different conclusions and yet still be competent document
- 19 examiners?
- 20 A It's my feeling that if two people, two competent
- 21 document examiners, are looking at the same evidence with
- 22 the same -- all the same evidence, same questioned, same
- known, all original documents, that they would come to the
- 24 same conclusion.
- Q In 100 percent of the time?

- 1 A Certainly they would be in the upper half of the
- 2 scale. They may not -- one may say identification and one
- may say highly probable or something, but, yes, I would say
- 4 that is correct.
- 5 Q Now, the documents -- I would ask you to turn to
- 6 Exhibit 75, your report. Do you have that in front of you,
- 7 ma'am?
- 8 A Yes, I do.
- 9 Q And does this exhibit, ma'am, list all of the
- documents that you were given to base your opinions from?
- 11 A Yes, it does.
- 12 Q And would you show that to the Court, please, to
- demonstrate what we're talking about?
- MS. LANCASTER: What are you talking about?
- MR. ROMNEY: What documents were you given -- what
- documents did you receive from counsel and what did you use
- 17 to make your conclusions?
- 18 MS. LANCASTER: Are you asking her about the known
- 19 documents also that she compared these --
- MR. ROMNEY: Yes. Oh, yes.
- THE WITNESS: Oh, okay.
- MS. LANCASTER: Okay. Well, I didn't understand
- the question either, Your Honor.
- 24 (Pause.)
- BY MR. ROMNEY:

- 1 Q Did you make a list at any time, ma'am, of the
- 2 documents that you were given to review?
- 3 A They're listed right in the problem of my report.
- 4 Q Okay. And let me rephrase that, then. Did you
- 5 make a list of the documents upon which you relied in making
- 6 your determination?
- JUDGE STEINBERG: I can short circuit this,
- 8 I think.
- 9 MR. ROMNEY: Certainly.
- 10 JUDGE STEINBERG: I have a fax here that
- 11 Ms. Lancaster exchanged, I don't know what the date was,
- 12 it's dated 2/21/01, and there's a list of questioned
- documents, O-1 through O-8, there's a list of known
- documents, K-1-1 through -- it goes on for four more pages,
- 15 K-11-2. And if you want to introduce that into evidence,
- 16 that would be fine.
- I mean, isn't that what you're asking?
- 18 MR. ROMNEY: Absolutely. I knew there was a
- 19 document out there, but it hadn't been presented to the
- 20 Court today.
- MS. LANCASTER: I'm sorry, Your Honor. I can't
- 22 find my copy of it or I would be happy to introduce it, but
- I know everyone got a copy of it.
- MR. ROMNEY: Well, I certainly think it would
- 25 probably help to be in the record.

- MS. LANCASTER: Do you have your copy of it?
- MR. ROMNEY: I do. I think it's complete, but I'm
- 3 not sure. It's a faxed copy.
- 4 (Pause.)
- JUDGE STEINBERG: Why don't we go off the record
- 6 while this is being resolved?
- 7 (A brief recess was taken.)
- 8 JUDGE STEINBERG: Back on the record.
- 9 Someone is going to make copies of the list of
- 10 known documents and Mr. Romney has kindly agreed to go and
- 11 then come back to that area.
- MR. ROMNEY: Thank you, Your Honor.
- 13 BY MR. ROMNEY:
- 14 Q Ms. Bolsover, let's turn to your report, Exhibit
- No. 75. If you will also take in front of you Exhibit
- No. 76, the questioned documents.
- 17 Let's address Q-1, if we could, please.
- JUDGE STEINBERG: Ms. Bolsover, doesn't have
- 19 No. 76.
- THE WITNESS: But I have this. I have this.
- 21 Okay. I've got this.
- BY MR. ROMNEY:
- Q Do you have that now?
- 24 A Yes.
- 25 Q The first document you identified as being signed

- 1 by Ronald Brasher was Q-3. Is that correct?
- 2 A That's correct.
- Q Did anybody let you know that Mr. Brasher had
- 4 admitted in court that he wrote that signature?
- 5 A No.
- 6 O How about O-4? You also state that is Ronald
- 7 Brasher.
- 8 A Yes. The date.
- 9 O The date.
- 10 A Yes.
- 11 Q You're not suggesting that the signature of Jim
- 12 Sumpter was written by Ronald Brasher.
- 13 A No.
- 14 Q In fact, you've eliminated him as the person for
- 15 that?
- 16 A Yes.
- 17 Q But the date of 6/18?
- 18 A Yes.
- 19 Q And are you aware that Mr. Brasher has admitted
- 20 that he wrote that date?
- 21 A No.
- 22 Q The ones that you said were highly probable were
- 23 0-2?
- 24 A Correct.
- 25 Q And that was the another signature of Mr. Brasher

- 1 as of 1998?
- 2 A Correct.
- 3 Q Are you aware that Mr. Ronald Brasher has admitted
- 4 in court executing that signature?
- 5 A No.
- 6 Q Exhibit No. Q-8, I think you also said that was
- 7 highly probable and that was the purported signature of Ruth
- 8 Bearden. Is that correct?
- 9 A That's correct.
- 10 Q And, again, were you aware that Mr. Brasher had
- admitted in court that he signed that document?
- 12 A No, I was not.
- 13 Q Were you made aware that Mr. Brasher admitted
- 14 those documents in his deposition?
- 15 A No.
- MR. ROMNEY: Excuse me, Your Honor. Just one
- 17 minute, please.
- 18 (Pause.)
- 19 BY MR. ROMNEY:
- 20 You were not able to make a determination, ma'am,
- 21 with any degree of certainty as to Q-1?
- 22 A That's correct.
- Q Did counsel advise you that Mr. Brasher had
- 24 admitted that he wrote that signature, Ronald Brasher?
- A No, she did not.

- 1 Q Would that have helped?
- 2 A No, it would not.
- Q Okay. Now, you did make a determination that O-5.
- 4 6 and 7 were all written by the same person?
- 5 A That's correct.
- 6 Q Were you able to make any determination, ma'am, as
- 7 to Q-4, the signature of Mr. Sumpter?
- 8 A No.
- 9 Q Did you actually try to make a determination as to
- whether or not his signature on 6/18 was written by the same
- person that wrote 5, 6, and 7?
- 12 A Yes.
- 13 Q And you were unable to do that?
- 14 A That's correct.
- 15 Q Could you tell us why?
- 16 A The characteristics were not the same.
- 17 Q But you determined that 5, 6, and 7 all had the
- 18 same characteristics?
- 19 A Yes.
- 20 Q Now, your identification of that, which level is
- 21 that, that 5, 6, and 7 are all the same?
- 22 A That they appear to be written by one writer.
- 23 Q Is that a probable or the probably? I mean, of
- your one, two, three schedule.
- 25 A I would put it in a probable.

- 1 Q That's number two?
- 2 A Yes. Well, three.
- JUDGE STEINBERG: Well, highly probable was number
- 4 two.
- 5 THE WITNESS: Right.
- 6 BY MR. ROMNEY:
- 7 Q Highly probable is number two? Okay. So number
- 8 three is probable?
- 9 THE COURT REPORTER: I'm sorry, there wasn't a
- 10 response to that question.
- 11 JUDGE STEINBERG: I think the response was yes.
- 12 THE WITNESS: Yes.
- MR. ROMNEY: I thought the witness nodded yes.
- 14 THE WITNESS: I'm sorry. I should speak.
- BY MR. ROMNEY:
- 16 Q Were you given some documents of signatures of
- Jennifer Hill, Melissa Sumpter and Norma Sumpter for June
- 18 22, 1996 and asked to make any conclusions about those
- 19 documents?
- 20 A Yes.
- 21 Q And I take you were not able to make any
- 22 conclusions at all? Your report seems to be silent on that.
- 23 A Can I see these documents?
- Q Do you have them with you? Do you have something
- 25 that you looked at?

- 1 If you would take before you Exhibit 19 in the big
- 2 book --
- JUDGE STEINBERG: It's probably around page 200.
- 4 MR. ROMNEY: Page 200 --
- 5 JUDGE STEINBERG: That's just a sheer guess.
- 6 MR. ROMNEY: We'll see if she can open it up the
- 7 first time, Your Honor.
- 8 JUDGE STEINBERG: There's a number on the bottom.
- 9 THE WITNESS: That one?
- JUDGE STEINBERG: Yes. And it's a Xerox of a
- 11 Xerox. 200.
- 12 THE WITNESS: Okay. This is 100.
- JUDGE STEINBERG: Yes, but we haven't gotten to
- 14 that yet.
- 15 THE WITNESS: Oh, okay.
- 16 JUDGE STEINBERG: We will, I suspect.
- 17 THE WITNESS: Okay. 200?
- JUDGE STEINBERG: Exhibit 19, page 200.
- BY MR. ROMNEY:
- 20 Q Do you have before you Exhibit 19, page 200,
- 21 ma'am?
- 22 A Yes.
- Q Did you receive a copy of that?
- 24 A Yes, I did.
- Q Well, that is not listed on Exhibit No. 76, the

- 1 questioned documents, is it?
- 2 A I received that at the end of February. Ms.
- 3 Lancaster sent it in at that time because she was under the
- 4 impression that because they were photocopies she couldn't
- 5 submit them initially, so she submitted them later.
- 6 Q Well, your report, Exhibit No. 75, is silent as to
- 7 that document. Is that correct?
- 8 A Yes. I have a second report.
- 9 MR. ROMNEY: A second report? Is this what,
- 10 rebuttal or what? I mean --
- MS. LANCASTER: That's what it was going to be,
- 12 yes, but these documents were sent after she had already
- 13 completed her first report, if you look at the dates,
- 14 Mr. Romney.
- MR. ROMNEY: Your Honor --
- MS. LANCASTER: After Mr. Higgs told me that he
- 17 was going to have his lady look at this and so I sent the
- 18 copies to her. I had been told originally -- I understood
- 19 that they couldn't examine copies, that they weren't
- 20 accurate.
- BY MR. ROMNEY:
- 22 Q Do you have a second report, mx?
- 23 A Yes, I do.
- Q Could you please produce that to the Court?
- MS. LANCASTER: I have it.

- 1 JUDGE STEINBERG: Do you have copies for
- 2 everybody?
- 3 MS. LANCASTER: Mm-hmm.
- JUDGE STEINBERG: Okay. Why don't you --
- 5 MS. LANCASTER: I was going to put it in later,
- 6 after --
- JUDGE STEINBERG: Why don't you hand it now,
- 8 please.
- 9 MS. LANCASTER: Hold on. Let me find it.
- 10 (Pause.)
- MS. LANCASTER: I have to find it, Your Honor.
- 12 I had the thing separate, Your Honor. I don't see my
- 13 envelope.
- 14 JUDGE STEINBERG: We can do this off the record.
- 15 (A brief recess was taken.)
- 16 JUDGE STEINBERG: On the record now.
- While we were off the record, Ms. Lancaster
- distributed a report from Ms. Bolsover dated March 5, 2001
- 19 and Ms. Lancaster stated that she received the report this
- 20 morning.
- MS. LANCASTER: Yes, sir.
- 22 JUDGE STEINBERG: Have you had a chance to review
- 23 it?
- MS. LANCASTER: Not really. I mean, I talked to
- her briefly about it, but I haven't sat down and gone

- 1 through it. No.
- JUDGE STEINBERG: Okay.
- 3 MR. ROMNEY: Thank you.
- 4 BY MR. ROMNEY:
- 5 Q Ms. Bolsover, would you please turn to Exhibit 19,
- 6 page 200?
- 7 A I'm there.
- 8 Q According to your second report dated March 5,
- 9 2001, which is not yet in evidence, it is your determination
- 10 that Norma Sumpter most probably wrote that signature,
- 11 correct?
- 12 A Probably wrote it. Yes.
- 13 Q Page 208, do you have that before you, ma'am?
- 14 A Yes.
- 15 Q That purports to be the signature of Jennifer
- 16 Hill. Is that correct?
- 17 A That's correct.
- 18 Q And according to your second report dated March 5,
- 19 2001, it's your conclusion that Jennifer Hill most probably
- 20 wrote that signature. Is that not right?
- 21 A She probably wrote it. Yes.
- 22 Q 216, please. Do you have that before you, ma'am?
- 23 A Yes.
- Q According to your report dated March 5, 2001, it
- is your conclusion, your expert opinion, ma'am, that Melissa